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United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.
ROBERT ALLEN POOLEY,

Defendant.

CASE NO. 2:21-CR-111 WBS
STIPULATIONS OF THE PARTIES

DATE: May 15, 2024
TIME: 9:00 a.m.
COURT: Hon. William B. Shubb

The United States, by and through its attorneys of record, Katherine T. Lydon and Dhruv M. Sharma, Assistant United States Attorneys, and Robert Pooley, through his attorneys Mia Crager and Megan McLoughlin, hereby submit the following stipulations.

The parties agree to the following stipulations regarding authentication of and foundation for the following exhibits:

1. IT IS HEREBY STIPULATED between the parties that Government Exhibits 500-519 are original and authentic documents seized from Pooley's locker at the Parachute Center on January 30, 2018. The documents referenced above are as follows:

Physical Evidence Seized From Pooley's Locker at Parachute Center				
500	"Tandem Instruction for Dummies" 3-ring binder (contains USPA Tandem Instructor Rating Course Proficiency UPT Tandem Instructor Certification Forms with Yuri Garmashov's preprinted signature) found in Pooley's locker	Original		
501	March 2012 USPA and UPT documents for Federico Busanello found in manilla envelope in Pooley's locker Pooley's wet and preprinted signatures	Original		
502	December 2013 USPA and UPT documents for Kertis Gilchrist found in manilla envelope in Pooley's locker with Pooley's wet and preprinted signatures	Original		
503	April 2014 USPA and UPT documents for Ricardo Santos found in manilla envelope in Pooley's locker with Pooley's wet and preprinted signatures	Original		
504	April 2014 USPA and UPT documents for Thomas Rodriguez de Oliveira found in manilla envelope in Pooley's locker with Pooley's wet and preprinted signatures	Original		
505	April 2014 USPA and UPT documents for John Platner found in manilla envelope in Pooley's locker with Pooley's wet and preprinted signatures	Original		
506	May 2015 USPA and UPT documents for Kenton Outtrim found in manilla envelope in Pooley's locker with Pooley's wet and preprinted signatures	Original		

507	June 2015 USPA and UPT documents for Edgar Tokria found in manilla envelope in Pooley's locker with Pooley's wet and preprinted signatures	Original		
508	June 2015 USPA and UPT documents for James E. Stanley found in manilla envelope in Pooley's locker with Pooley's wet and preprinted signatures	Original		
509	June 2015 USPA and UPT documents for Lucas Montenegro found in manilla envelope in Pooley's locker with Pooley's wet and preprinted signatures	Original		
510	August 2015 USPA and UPT documents for Guillermo Canatta Sosa found in Pooley's locker with Garmashov's preprinted signatures	Original		
511	August 2015 USPA documents for Adam Johnson found in Pooley's locker with Garmashov's preprinted signatures	Original		
512	September 2015 USPA documents for Minsik Jeong found in Pooley's locker with Garmashov's preprinted signatures	Original		
513	September 2015 USPA and UPT documents for Jordan Van den Berg found in Pooley's locker with Garmashov's preprinted signatures	Original		
514	September 2015 USPA and UPT documents for Amit Anruesky found in Pooley's locker with Garmashov's preprinted signatures	Original		

515	September 2015 USPA and UPT documents for Luis Lopez Fleitas found in Pooley's locker with Garmashov's preprinted signatures	Original		
516	September 2015 USPA documents for Matias Baeza Parker found in Pooley's locker with Garmashov's preprinted signatures	Original		
517	September 2015 USPA documents for Eduardo Denis Kim found in Pooley's locker with Garmashov's preprinted signatures	Original		
518	September 2015 USPA documents for James Joseph Moore Garcia -Ortega found in Pooley's locker with Garmashov's preprinted signatures	Original		
519	October 2015 USPA and UPT documents for Jeanremy Boulet-Giroux found in Pooley's locker with Garmashov's preprinted signatures	Original		

2. IT IS HEREBY STIPULATED between the parties that Government Exhibits 600-707 and Defense Exhibit 2188 all represent documents recovered from electronic devices seized at the Parachute Center on January 30, 2018. Specifically, exhibits 601-608 and 700-707 are authentic copies of documents found on a Seagate hard drive with serial number Z3TQ24TJ contained within a HP A2e Desktop computer. Further, exhibits 600 and 609-620 and Defense Exhibit 2188 are authentic copies of documents found on a Western Digital hard drive with serial number WCC4M1084583. The documents referenced above are as follows:

Electronic Evidence seized from Computers at Parachute Center				
600	JPG document entitled "Yuri Signiture"	POOLEY_00031223		

601	PDF document entitled “Yuri UPT Waiver” containing pre-filled signature of Yuri Garmashov on a UPT Tandem Parachute Jump Agreement	POOLEY_00031231- POOLEY_00031232		
602	PDF document entitled “Yur_Rob Canopy Prof Card” containing pre-filled signature of Yuri Garmashov on a USPA Canopy Piloting Proficiency Card	POOLEY_00031155		
603	PDF document entitled “Yuri D License App Signed” containing pre-filled signature of Yuri Garmashov on a USPA License Application	POOLEY-00031182- POOLEY_00031183		
604	PDF document entitled “IRM 2015 TANDEM” containing USPA 2014-2015 Instructional Rating Manual	POOLEY_00030972- POOLEY_00031065		
605	PDF document entitled “Yuri UPT Rating Application and CCA” containing pre-filled signature of Yuri Garmashov on a UPT Tandem Instructor Certification Form	POOLEY_00031228		
606	PDF document entitled “Yuri Tandem Prof Card Signed” containing pre-filled signature of Yuri Garmashov on a USPA Tandem Instructor Rating Course Proficiency Card	POOLEY_00031226- POOLEY_00031227		
607	PDF document entitled “Yuri Signed New UPT Logbook” containing pre-filled signature of Yuri Garmashov on a UPT Tandem Instructor Training Logbook	POOLEY_00031214- POOLEY_00031221		
608	PDF document entitled “IRM TANDEM” containing Tandem Instructor Rating Course manual	POOLEY_00031102- POOLEY_00031151		
609	JPG image entitled “Yuri initials”	POOLEY_00031185		

610	PDF document entitled “Yuri CanopyProfCard Complete” containing pre-filled signature of Yuri Garmashov on a USPA Canopy Piloting Proficiency Card	POOLEY_00031159		
611	PDF document entitled “Yuri Tandem Prof Card Complete” containing pre-filled signatures of Yuri Garmashov on a USPA Tandem Instructor Rating Course Proficiency Card	POOLEY_00031224- POOLEY_00031225		
612	JPG image of Yuri initials entitled “Yuri initials.cb62bbdd389b48898f2e5244977cb2c5.jpg”	POOLEY_00031184		
613	PDF document entitled “Yuri Canopy Prof Card” containing pre-filled signatures of Yuri Garmashov on a USPA Canopy Piloting Proficiency Card	POOLEY_00031158		
614	PDF document entitled “Yuri Signed Complete Paperwork Package UPT and USPA” containing pre-filled signatures of Yuri Garmashov on a USPA membership application	POOLEY_00031194- POOLEY_00031213		
615	PDF document entitled “Yuri B,C,D-License App Complete” containing pre-filled signatures of Yuri Garmashov on a USPA license application	POOLEY_00031156- POOLEY_00031157		
616	JPG image entitled Yuri Signiture.cb62bbdd389b48898f2e5244977cb2c5.jpg	POOLEY_00031222		
617	PDF document entitled “Yuri Complete Paperwork Package” containing pre-filled signatures of Yuri Garmashov on a USPA documents	POOLEY_00031162- POOLEY_00031181		

618	PDF document entitled "Lachlan Mackay USPA" containing Tandem Instructor Rating Course Proficiency Card for Lachlan Mackay	POOLEY_00031152- POOLEY_00031154		
619	JPG image entitled "Rob Initials"	POOLEY_00033054		
620	JPG image entitled "Rob Signature"	POOLEY_00033055		
2188	October 2015 USPA Coach rating documents for Brad North	POOLEY_00030287- POOLEY_00030289		
Emails seized from Computers at Parachute Center				
700	Email exchange between Parachute Center and Lassi-Pekka Ruuskanen dated October 3, 2015, identifying Pooley as tandem examiner	POOLEY_00030962		
701	Email exchange between Parachute Center and Gavin Creagh dated August 17, 2015, identifying Pooley as tandem examiner	POOLEY_00030963		
702	Email from Parachute Center to Rob Pooley dated June 28, 2016, forwarding message from Fabricio Palomino (Skydive Baja) re: tandem ratings	POOLEY_00030967		
703	Email from Parachute Center to Rob Pooley dated March 21, 2016, forwarding message from Mahesh Birajdar re: Tandem Master Course	POOLEY_00030968		
704	Email from Parachute Center to Rob Pooley dated August 1, 2016, forwarding message from Alexis Patterson re: tandem master lessons	POOLEY_00030965		
705	Email from Parachute Center to Lachlan Fox, copying Rob Pooley, dated October 1, 2016, re: tandem ratings	POOLEY_00030966		

706	Email exchange between Parachute Center and Mickey Jeffet dated July 1, 2015, identifying Rob Pooley as tandem examiner	POOLEY_00030969- POOLEY_00030971		
707	Email exchange between Parachute Center and Richard Keir dated January 5, 2016, identifying Rob Pooley as tandem examiner	POOLEY_00030964		

3. IT IS HEREBY STIPULATED between the parties that Government Exhibits 1301-1314 are records of the Department of Transportation – Office of Inspector General (DOT-OIG) related to their search, seizure and analysis of electronic devices obtained from the Parachute Center on January 30, 2018. Specifically: (i) Exhibits 1301-1304 are authentic copies of DOT-OIG records identifying the electronic devices seized and including photographs of the devices and locations seized; and (ii) Exhibits 1305-1314 reflect authentic copies of screenshot pictures taken by Special Agent Corry Noel during his review of the electronic contents of certain devices seized from the Parachute Center. The documents referenced above are as follows:

Documents related to DOT-OIG SA Corry Noel				
1301	DOT-OIG Forensic Media Collection Form	POOLEY_00001766- POOLEY_00001800		
1302	DOT-OIG FMC Pictures of Computer with serial number Z3TQ24TJ	POOLEY_00001823- POOLEY_00001829		
1303	DOT-OIG FMC Pictures of Pooley's Locker	POOLEY_00001831		
1304	DOT-OIG FMC Pictures of Hard Drive with Serial Number WCC4M1084583	POOLEY_00001847		
1305	Screenshot of folder structure of folder "Users" on Computer with serial number Z3TQ24TJ	POOLEY_00033038		
1306	Screenshots of contents of "Complete Paperwork Package" folder on Computer with serial number Z3TQ24TJ	POOLEY_00033039- 40		

1307	Screenshot of folder structure of folder “Windows Live Mail” on Computer with serial number Z3TQ24TJ	POOLEY_00033041		
1308	Screenshots of contents of “Sent Mail” folder on Computer with serial number Z3TQ24TJ	POOLEY_00033042-43		
1309	Screenshot of folder structure of folder “shares” on Hard Drive with Serial Number WCC4M1084583	POOLEY_00033044		
1310	Screenshots of contents of folder “Robs Docs” on Hard Drive with Serial Number WCC4M1084583	POOLEY_00033045-46		
1311	Screenshots of contents of folder “New Docs” on Hard Drive with Serial Number WCC4M1084583	POOLEY_00033047-48		
1312	Screenshots of contents of folder “Candidate Paperwork” on Hard Drive with Serial Number WCC4M1084583	POOLEY_00033049-50		
1313	Screenshot of folder structure of folder “Rob to sort” on Hard Drive with Serial Number WCC4M1084583	POOLEY_00033051		
1314	Screenshots of contents of folder “transcoded_files” on Hard Drive with Serial Number WCC4M1084583	POOLEY_00033052-53		

1 Dated: May 20, 2024

PHILLIP A. TALBERT
United States Attorney

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3 By: /s/ DHRUV M. SHARMA
4 KATHERINE T. LYDON
5 DHRUV M. SHARMA
6 Assistant United States Attorneys

7 Dated: May 20, 2024

8 By: /s/ MEGHAN MCLOUGHLIN
9 MIA CRAGER
10 MEGHAN MCLOUGHLIN
11 Assistant Federal Defenders
12 Attorneys for defendant
13 ROBERT POOLEY
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